

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

JANE DOE, et al.,)	
)	
Plaintiffs,)	
)	
and)	
)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff-Intervenor)	
)	
v.)	NO. 11-cv-01999-JNE-SER
)	
ANOKA-HENNEPIN SCHOOL)	
DISTRICT NO. 11, et al.,)	
)	
)	
Defendant.)	
)	
and)	
)	
)	
E.R., by her next friend and parent,)	NO. 11-cv-02282-JNE-SER
Quana Hollie;)	
)	
Plaintiff,)	
)	
and)	
)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff-Intervenor)	
)	
vs.)	
)	
ANOKA-HENNEPIN SCHOOL)	
DISTRICT NO. 11, et al.,)	
)	
Defendants.)	

JOINT MOTION TO APPROVE PROPOSED CONSENT DECREE

Plaintiffs JANE DOE, *et al.*, and E.R., Defendants, the Anoka-Hennepin School District, its School Board, and certain officials named in the complaints, and the United States of America (“United States”), applicant for intervention, by their attorneys, jointly move the Court for an order approving the proposed consent decree filed concurrently with this Motion. The Motion is based upon the supporting memoranda of law, the entire file, and proceedings herein.

Respectfully submitted,

(Signature Pages to Follow)

Dated: March 5, 2012

FOR THE UNITED STATES OF AMERICA:

B. TODD JONES
United States Attorney
District of Minnesota
United States Department of Justice

GREGORY G. BROOKER, #166066
ANA H. VOSS, #483656
Assistant United States Attorneys
United States Attorney's Office
District of Minnesota
600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55415
Tel: 612-664-5600
greg.brooker@usdoj.gov
anna.voss@usdoj.gov

OFFICE FOR CIVIL RIGHTS
OFFICE OF THE GENERAL
COUNSEL
U.S. Department of Education
Of Counsel

THOMAS E. PEREZ
Assistant Attorney General
Civil Rights Division
United States Department of Justice

ANURIMA BHARGAVA, Chief
KATHLEEN S. DEVINE, Senior Counsel
Civil Rights Division
Educational Opportunities Section

s/ Torey B. Cummings
TOREY B. CUMMINGS
(*admitted pro hac vice*)
TAMICA H. DANIEL
(*admitted pro hac vice*)
Trial Attorneys
U.S. Department of Justice
Civil Rights Division
Educational Opportunities Section
950 Pennsylvania Avenue, NW
Washington, D.C. 20530
Tel: 202-305-4204
torey.cummings@usdoj.gov
tamica.daniel@usdoj.gov

Dated: March 5, 2012

FAEGRE BAKER DANIELS LLP

s/ Michael A. Ponto
Michael A. Ponto, #203944
Martin S. Chester, #031514X
Christopher H. Dolan, #0386484
Zack L. Stephenson, #0391533
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402-3901
mponto@faegrebd.com
mchester@faegrebd.com
cdolan@faegrebd.com
zstephenson@faegrebd.com
(612) 766-7000

SOUTHERN POVERTY LAW CENTER

Mary Bauer (*admitted pro hac vice*)
Christine P. Sun (*admitted pro hac vice*)
Samuel Wolfe (*admitted pro hac vice*)
mary.bauer@splcenter.org
christine.sun@splcenter.org
sam.wolf@splcenter.org
400 Washington Avenue
Montgomery, AL 36104
(334) 956-8200

**NATIONAL CENTER FOR LESBIAN
RIGHTS**

Christopher Stoll (*admitted pro hac vice*)
cstoll@nclrights.org
870 Market Street, Suite 370
San Francisco, CA 94102
(415) 365-1335

*Attorneys for Plaintiffs Jane Doe; K.R., By
His Next Friends and Parents, Rebecca
Rooker and Jim Rooker; D.F., By His Next
Friends and Parents, Burnetta Frei and
Jeffrey Frei; B.G., By Her Next Friend and
Parent, Marty Geldert and D.M.-B., By His
Next Friends and Parents Michael McGee
And Jason Backes*

Dated: March 5, 2012

CULBERTH & LIENEMANN, LLP

s/ Celeste E. Culberth

Celeste E. Culberth, Reg. No. 228187

Leslie E. Lienemann, Reg. No. 230194

1050 UBS Plaza

444 Cedar Street

St. Paul, MN 55101

cculberth@clslawyers.com

llienemann@clslawyers.com

(651) 290-9305

**NATIONAL CENTER FOR LESBIAN
RIGHTS**

Christopher Stoll (*admitted pro hac vice*)

870 Market Street, Suite 370

San Francisco, CA 94102

cstoll@nclrights.org

iturner@nclrights.org

(415) 365-1335

*Attorneys for Plaintiff E.R., By Her Next
Friend and Parent, Quana Hollie*

Dated: March 5, 2012

GREENE ESPEL P.L.L.P.

s/ Jeanette M. Bazis

John M. Baker, Reg. No. 174403

Jeanette M. Bazis, Reg. No. 255646

Mark L. Johnson, Reg. No. 0345520

Kathleen K. Statler, Reg. No. 161809

Sybil L. Dunlop, Reg. No. 0390186

200 South Sixth Street, Suite 1200

Minneapolis, MN 55402

jbaker@greeneespel.com

jbazis@greeneespel.com

mjohnson@greeneespel.com

kstatler@greeneespel.com

sdunlop@greeneespel.com

(612) 373-0830

Attorneys for Defendants